

Attorneys for the Debtor and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

**NEWLAND INTERNATIONAL
PROPERTIES, CORP.,**

Debtor.

Chapter 11

Case No. 13-11396 (MG)

NOTICE OF FILING OF PLAN SUPPLEMENT

PLEASE TAKE NOTICE THAT on April 30, 2013, Newland International Properties, Corp. (the “**Debtor**”) filed with the United States Bankruptcy Court for the Southern District of New York (the “**Court**”) (a) the *Prepackaged Plan of Reorganization for the Debtor under Chapter 11 of the Bankruptcy Code* [Docket No. 11] (as may be modified, amended or supplemented from time to time, the “**Plan**”); and (b) the *Disclosure Statement for the Prepackaged Plan of Reorganization for the Debtor under Chapter 11 of the Bankruptcy Code* [Docket No. 12] (the “**Disclosure Statement**”).¹

PLEASE TAKE FURTHER NOTICE THAT prior to the commencement of the above-referenced Chapter 11 Case, the Debtor solicited acceptances for the Plan pursuant to the procedures for the solicitation and tabulation of votes outlined in the Disclosure Statement (the “**Solicitation Procedures**”) as described in the *Affidavit of Service of Solicitation Packages and Declaration of Stephenie Kjontvedt on Behalf of Epiq Bankruptcy Solutions, LLC Regarding the Voting and Tabulation of Ballots Cast on the Prepackaged Plan of Reorganization for the Debtor Under Chapter 11 of the Bankruptcy Code* filed on April 30, 2013 [Docket No. 13].

¹ Capitalized terms used but not otherwise defined herein shall have the same meaning ascribed to such terms in the Plan or the Disclosure Statement.

PLEASE TAKE FURTHER NOTICE THAT as contemplated by the Plan and the Disclosure Statement, the Debtor is filing the plan supplement (the “***Plan Supplement***”) which contains, in substantially final form, the various documents and agreements that are necessary to implement the Plan, comprising of the following:

Exhibit A: Indenture

Exhibit B: Amended and Restated Agreement of Appointment and Acceptance of Co-Trustee

Exhibit C: CCSA Satisfaction and Release Agreement

Exhibit D: Form of Representation and Covenant Letter

Exhibit E: Limited Financial Guaranty

Exhibit F: Non-Disturbance Agreement

Exhibit G: Amendment to Mortgage Agreement

Exhibit H: Amendment to the Articles of Incorporation of Newland International Properties Corp.

Exhibit I: Amendment to the Articles of Incorporation of Ocean Point Development Corp.

Exhibit J: Shareholders Agreement of Ocean Point Development Corp.

Exhibit K: Novation Agreement by and between Kassir Development Corp. and Newland International Properties, Corp.

Exhibit L: Novation Agreement by and between Opcorp-Arsersa International Inc. and Newland International Properties Corp.

Exhibit M: Resolution No. SMV-180-13 dated May 15th, 2013 by means of which the Superintendence of the Securities Market of the Republic of Panama authorizes amendments to certain Indenture with regards to the Public Offering of Newland International Properties, Corp. 9.5% 2014 Secured Notes previously authorized by Resolution CNV-289-07 issued by the former National Securities Commission of the Republic of Panama.

Exhibit N: Stock Pledge Agreement among Newland International Properties Corp., Ocean Point Development Corp. and Global Financial Funds, Corp.

The documents contained in the Plan Supplement are integral to and part of the Plan and, if the Plan is approved, shall be approved in the Confirmation Order. The Debtor reserves the right to alter, amend, supplement or modify the Plan Supplement.

PLEASE TAKE FURTHER NOTICE THAT that, pursuant to the *Order (A) Scheduling a Combined Hearing to Consider the Adequacy of the Disclosure Statement and Confirmation of the Plan; (B) Establishing Deadlines and Procedures to File Objections Related Thereto; and (C) Approving the Form and Manner of the Notice of Combined Hearing*, entered on May 1, 2013 [Docket No. 30], the Court will consider, among other things, the approval of the Solicitation Procedures, the adequacy of the Disclosure Statement and confirmation of the Plan on **May 28, 2013 at 5:30 p.m. (prevailing U.S. Eastern Time)** before the Honorable Judge Martin Glenn, in the United States Bankruptcy Court for the Southern District of New York, located at One Bowling Green, Courtroom No. 501, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE THAT the deadline for filing objections to the Plan, the adequacy and approval of the Disclosure Statement and the Solicitation Procedures is **May 21, 2013 at 4:00 p.m. (prevailing U.S. Eastern Time)** (the “***Objection Deadline***”). Any objection must: (a) be in writing; (b) comply with the Bankruptcy Rules, the Local Bankruptcy Rules, and other case management rules and orders of this Court; (c) state the name and address of the objecting party, and the nature and amount of any claim or interest asserted by the objecting party against the estate or property of the Debtor; (d) state with particularity the legal and factual basis for such objection and, if applicable, a proposed modification to the Plan that would resolve such objection; and (e) be filed, contemporaneously with a proof of service, with the Court and served so that it is **actually received** no later than the Objection Deadline by the following parties:

**Office of the United States
Trustee:**

**The Office of the United States Trustee for the
Southern District of New York**

Attn: Susan D. Golden
Attn: Serene Nakano
33 Whitehall Street, 21st Floor
New York, New York 10004

Counsel to the Debtor:

Gibson, Dunn & Crutcher LLP

Attn: J. Eric Wise
Attn: Shira D. Weiner
200 Park Avenue
New York, New York 10166

**Counsel to the Indenture
Trustee:**

Chadbourn & Park LLP

Attn: Marian Baldwin Fuerst
30 Rockefeller Plaza
New York, New York 10112

Counsel to the Steering Group:

Seward & Kissel LLP

Attn: John R. Ashmead
One Battery Park Plaza
New York, New York 10004

**United States Securities and
Exchange Commission:**

**United States Securities and Exchange Commission,
New York Regional Office**

Attn: George S. Canellos, Regional Director
3 World Financial Center, Suite 400
New York, New York 10281

All other parties: Any persons who have filed a request for notice in the
Chapter 11 Case pursuant to Bankruptcy Rule 2002.

PLEASE TAKE FURTHER NOTICE THAT if you would like to obtain a copy of the Disclosure Statement, the Plan, the Plan Supplement or related documents, you should contact Epiq Bankruptcy Solutions, LLC, the claims and noticing agent retained by the Debtor in this Chapter 11 Case (the “*Claims and Noticing Agent*”), by: (a) calling the Debtor’s Claims and Noticing Agent at (646) 282-2400; (b) visiting the Debtor’s restructuring website at <http://dm.epiq11.com/newland>; (c) emailing the Debtor’s Claims and Noticing Agent at newland@epiqsystems.com; and/or (d) writing to Newland International Properties, Corp., c/o Epiq Bankruptcy Solutions, LLC, 757 Third Avenue, 3rd Floor, New York, New York 10017. You may also obtain copies of any pleadings filed in this Chapter 11 Case for a fee via PACER at <http://ecf.nysb.uscourts.gov>.

Dated: May 17, 2013
New York, New York

/s/ J. Eric Wise

J. Eric Wise

Shira D. Weiner

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